

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MUBARIK IBRAHIM,

Defendant.

CASE NO. 2:23-mj-20

**JOINT MOTION FOR EXTENSION OF TIME DURING WHICH
INDICTMENT/INFORMATION MUST BE FILED**

The United States of America and Defendant Mubarik Ibrahim (collectively, the “Parties”) jointly move this Court for an order extending the time for the return of an indictment or information pursuant to 18 U.S.C. § 3161(b) from April 14, 2023, to May 26, 2023. The Defendant is aware of his right to timely filing of an indictment or information, afforded to him under 18 U.S.C. § 3161(b), and hereby waives that right for the purposes of this motion. The Parties believe this continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

The Parties have discussed this matter and believe that pre-indictment resolution of the matter may be possible. There are additional issues that need to be further discussed prior to resolution of the case. Furthermore, if pre-indictment resolution were to occur, additional time would be needed to negotiate and prepare the appropriate paperwork. The Parties are not able to conclude these discussions by the date which the indictment or information currently must be filed. The Parties have exercised and continue to exercise due diligence in reaching a prompt resolution of this matter, but request an extension of the § 3161(b) deadline.

For these reasons, the Parties request an extension of the time within which an indictment or information may be filed in this case.

Respectfully submitted,

KENNETH L. PARKER
UNITED STATES ATTORNEY

s/Peter K. Glenn-Applegate
PETER K. GLENN-APPLEGATE (0088708)
Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
Phone No.: (614) 469-5715
Fax No.: (614) 469-2200
Email: peter.glenn-applegate@usdoj.gov

s/Stacey MacDonald, by s/Peter K. Glenn-Applegate
per email authorization on 04/07/2023
STACEY MacDONALD
Counsel for the Defendant
Office of the Federal Public Defender
10 W. Broad St., Ste. 1020
Columbus, OH 43215
Phone: (614) 469-2999
Fax: (614) 469-5999
Email: stacey_macdonald@fd.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Extension of Time was electronically served this 11th day of April, 2023, on all counsel of record.

s/Peter K. Glenn-Applegate
PETER K. GLENN-APPLEGATE (0088708)
Assistant United States Attorney